

COMMENT: Regarding Docket No. 07-172

Submitted by: David W. Palmer, President, WATH-AM, Athens, Ohio

Date: 01/21/2008 (after deadline)

I apologize for submitting this comment after the deadline but just learned of this possible action.

I heartily support the FCC approving the use of FM Translators for AM stations who have no, or extremely limited, nighttime service authorization. If this FM translator proposal were adopted and though such would not allow them to equal their normal coverage area, it would, in many cases, assist these stations in covering their city of license and better serve its listeners.

I believe "AM on FM" is an idea whose time has come and I urge the FCC to go ahead and implement its proposal to permit AM operators to own FM translators and use them to fill-in or enhance local AM service to our communities.

WATH (970 kHz 1,000 watts) has offered locally-relevant programming since 1950 and we believe *localism* is the heart of radio's survivorship. In 1987 WATH was given permission to begin nighttime operation albeit with only 26 watts! But even 26 watts allowed us to cover most of our city of license. However, the capability of this extremely low power authorization has been eroded in recent years by new or additional interference from power lines, new buildings, lighting dimmers, and especially computers and energy-efficient compact fluorescent light bulbs as well as other forms of man-made interference. Terrain has always been an issue and here in Southeastern Ohio the terrain is rugged.

Broadcasting high school sports, local political events & meetings, and other meaningful activities occurring at night has been a challenge when our signal is so limited. We have received inquiries from the public asking why we didn't file for additional nighttime capabilities. We have tried to explain to them the interference policies but they don't fully appreciate these explanations. They simply want to be able to hear us at night as well as day.

I also want to stress that if the Commission adopts this proposal, WATH and other AM stations may be able to compete more effectively against the FM stations, satellite radio, Internet and any other emerging sources of information and entertainment.

I heartily support the FCC approving the use of FM Translators for AM stations.